

**REMARKS**

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-70 are pending.

**35 U.S.C. §102 Claim Rejections**

Claims 1-70 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. US 2002/0152102, to Brodersen et al. (hereinafter, "Brodersen"). Applicant respectfully traverses the rejection.

Brodersen describes state model development for industrial and business processes and relates to business objects which model steps or states in a business process or in a manufacturing process (§0001 and §0008). A "state model is created by selecting a template for the state model, and selecting industrial or business object components for the state model" (*Abstract*).

To the contrary, Applicant describes a finite state model-based testing system that enables a user to define and generate a model *for testing a software application* (*Summary*, p.9, lines 2-3). Additionally, a graphical user interface enables a user to define a state table and associated software application transitions from which a model generation engine generates an entire model (i.e., state table) of the software application under test (*Summary* p.9, lines 8-11).

Claim 1 recites a finite state model-based testing system comprising "a model generation engine to generate a model of a software application to be tested", and "a graphical user interface to enable user entry of parameters for defining the model."

1 Brodersen does not show or disclose "a model generation engine to  
2 generate a model of a software application to be tested", as recited in claim 1. The  
3 Office rejects a "model generation engine" in view of the title and abstract of  
4 Brodersen, neither of which suggest a model of a software application to be tested,  
5 as also recited in claim 1. Brodersen only describes "State Models for Monitoring  
6 Process" (*Title*), and a state model of an industrial or business process (*Abstract*).

7 Brodersen also does not show or disclose "a graphical user interface to  
8 enable user entry of parameters for defining the model", as recited in claim 1.  
9 Brodersen illustrates a user interface that is a state model view of a business  
10 process (Fig. 3). Brodersen says nothing about a graphical user interface to define  
11 a model of a software application to be tested, as recited in claim 1.

12 Accordingly, claim 1 is allowable over the non-analogous Brodersen and  
13 Applicant respectfully requests that the §102 rejection be withdrawn.

14  
15 Claims 2-11 are allowable by virtue of their dependency upon claim 1.  
16 Additionally, claims 2-11 are allowable over Brodersen for independent reasons.  
17 For example:

18 Claim 8 recites "a graph traversal menu to enable a user to select a graph  
19 traversal program and generate a test sequence of inputs for the software  
20 application." Brodersen does not show or disclose a graph traversal menu or any  
21 test sequence of inputs for a software application, as recited in claim 8. The  
22 Office rejects claim 8 in view of Brodersen ¶¶0013-15. However, these sections  
23 of Brodersen only describe state models for business models and industrial  
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1 models. There is no mention of a graph traversal menu or of a test sequence of  
2 inputs for a software application, as recited in claim 8.

3 Claim 9 recites "a graph traversal program to generate a test sequence of  
4 inputs for the software application"; Claim 10 recites "a test execution menu to  
5 enable a user to select a test driver program and initiate a test of the software  
6 application"; and Claim 11 recites "a test driver program to execute a test  
7 sequence of application inputs on the software application". Brodersen does not  
8 show or disclose any of these features, as described above in the response to the  
9 rejection of claim 8.

10 The Office also rejects claims 9, 10, and 11 in view of Brodersen  
11 ¶¶0013-15. However, as described above, these sections of Brodersen only  
12 describe state models for business models and industrial models. There is no  
13 mention of a graph traversal program to generate a test sequence of inputs for a  
14 software application (claim 9), a test execution menu or a test driver program to  
15 initiate a test of the software application (claim 10), or a test driver program to  
16 execute a test sequence of application inputs on a software application (claim 11).

17 Accordingly, claims 8-11 are allowable over Brodersen for these additional  
18 reasons and the §102 rejection should be withdrawn.

19  
20 Independent Claims 12, 28, 33, 38, and 49 recite a "user interface for  
21 testing a software application" (claim 12), a user interface "to define a model of a  
22 software application to be tested" (claims 28, 33), "a software application to be  
23 tested" (claim 38), and a user interface application "to facilitate user definition of a  
24 finite-state model to test a software application" (claim 49). As described above in  
25

1 the response to the rejection of claim 1, Brodersen is non-analogous and only  
2 describes a state model of an industrial or business process. Brodersen says  
3 nothing about a user interface for software application testing.

4 Accordingly, claims 12, 28, 33, 38, and 49 are allowable over Brodersen  
5 and Applicant respectfully requests that the §102 rejection be withdrawn.

6  
7 Claims 13-27 are allowable by virtue of their dependency upon claim 12  
8 (either directly or indirectly); Claims 29-32 are allowable by virtue of their  
9 dependency upon claim 28 (either directly or indirectly); Claims 34-37 are  
10 allowable by virtue of their dependency upon claim 33 (either directly or  
11 indirectly); Claims 39-41 are allowable by virtue of their dependency upon claim  
12 38; and Claims 50-55 are allowable by virtue of their dependency upon claim 49.  
13 Additionally, the dependent claims recite features similar to those of claims 8-11  
14 and, as described above in the response to the rejection of claims 8-11, are  
15 allowable over Brodersen for these additional reasons.

16  
17 Claim 42 recites a model editor "to define a model of a software application  
18 to be tested", "a model generation engine to generate the model of the software  
19 application", "a graph traversal program to generate a test sequence of inputs for  
20 the software application", and "a test driver program to read the test sequence of  
21 inputs for the software application and apply the test sequence to the software  
22 application".

23 As described above in the response to the rejection of claims 1 and 8-11,  
24 Brodersen does not show or disclose the features recited in claim 42. Brodersen  
25

1 says nothing about a software application to be tested, a graph traversal program to  
2 generate a test sequence of inputs for the software application, or a test driver  
3 program to apply the test sequence of inputs. Further, the Office cites sections of  
4 Brodersen that only describe development of state models for business or  
5 industrial processes. These cited sections of Brodersen do not show or disclose  
6 the features recited in claim 42.

7 Accordingly, claim 42 is allowable over Brodersen and Applicant  
8 respectfully requests that the §102 rejection be withdrawn.

9  
10 Claims 43-48 are allowable by virtue of their dependency upon claim 42.

11  
12 Independent Claims 56, 65, and 67 recite methods comprising "presenting a  
13 graphical user interface that facilitates user entry of state information and  
14 transition information about a software application to be tested" (claim 56);  
15 "presenting a user interface that facilitates user entry of state information and  
16 transition information about a software application to be tested", "a graph traversal  
17 program that generates a test sequence of inputs for the software application", and  
18 "a test driver program that executes a test sequence of application inputs on the  
19 software application" (claim 65); and "generating a test sequence of inputs for the  
20 software application with a graph traversal program", and "executing a test  
21 sequence of application inputs on the software application" (claim 67).

22 As described above in the response to the rejection of claims 1, 8-11, and  
23 42, Brodersen does not show or disclose a user interface for a software application  
24 to be tested, a graph traversal program that generates a test sequence of inputs for  
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1 the software application, or a test driver program that executes the test sequence of  
2 application inputs. Accordingly, claims 56, 65, and 67 are allowable over  
3 Brodersen and Applicant respectfully requests that the §102 rejection be  
4 withdrawn.

5  
6 Claims 57-64 are allowable by virtue of their dependency upon claim 56;  
7 Claim 66 is allowable by virtue of its dependency upon claim 65; and Claims  
8 68-69 are allowable by virtue of their dependency upon claim 67.

9  
10 Claim 70 recites a computer-readable medium comprising computer  
11 executable instructions that, when executed, direct a computing system to generate  
12 a test sequence of inputs for a software application to be tested with a graph  
13 traversal program and "execute a test sequence of application inputs on the  
14 software application".

15 As described above in the response to the rejection of claims 1, 8-11, and  
16 42, Brodersen does not show or disclose to generate a test sequence of inputs for a  
17 software application to be tested with a graph traversal program or to "execute a  
18 test sequence of application inputs on the software application", as recited in claim  
19 70.

20 Accordingly, claim 70 is allowable over Brodersen and Applicant  
21 respectfully requests that the §102 rejection be withdrawn.  
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**Conclusion**

Pending claims 1-70 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. If any issues remain that preclude issuance of this application, the Examiner is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

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